

EXHIBIT A

UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF SOUTH CAROLINA

IN RE:

Joyce Campbell White,

Debtor.

C/A No. 16-04078

STATEMENT OF DISPUTE
AND STIPULATION

The undersigned hereby certify that after consultation, the hearing on the Motion for Relief from Stay originally scheduled for September 6, 2018, after good faith efforts cannot be settled and remains contested so as to require the presentation of evidence and/or argument to the Court for determination. The following information is presented by way of stipulation of the parties:

1. Issues to be decided by the Court.
 - a. Whether BSI Financial should be granted relief from the automatic stay pursuant to 11 U.S.C. § 362(d)(1).
2. Position of Party/Parties (state w/ specificity).
 - a. Debtor's Position: Debtor believes that she is not delinquent on her post-petition mortgage payments in the amount of \$9,204.86, but has made payments through money orders and has been unable to date to provide proof of payments other than those shown on Exhibit D attached to the Motion for Relief from Stay. As such, Debtor will request at the hearing 35 months to cure the arrearage, which is the number of months remaining in her Chapter 13 case.
3. Names of Witnesses to be called at the hearing.
 - a. Debtor does not intend to call any witnesses.
4. Exhibits/Evidence to be presented (state whether admission is stipulated or any grounds for objection).
 - a. Debtor does not intend to present any evidence.
5. Statutory, Case Law or other Applicable Authority.
 - a. 11 U.S.C. § 362(d)(1)
 - b. In re Bowen, C/A No. 13-04851-JW
6. Estimated Length of Hearing.
 - a. 15 minutes

7. Telephone and Facsimile Number, Electronic Mail address of Counsel/Party/Parties.

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8. Final Authority. Unless otherwise indicated by a separately filed motion, filed simultaneously herewith, which requests that the Court determine whether this proceeding is subject to the entry of final orders or judgments by this Court, **the parties submitting this Joint Statement of Dispute consent to this Court entering final orders and judgments in this proceeding.**

September 5, 2018
(DATED)

/s/ Lauren J. Schumann
(SIGNATURE)

(DATED)

(SIGNATURE)